

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
)	
UNITED STATES OF AMERICA)	
)	
v.)	No. 16-10094-LTS
)	
ROSS MCLELLAN,)	
Defendant)	
)	
_____)	

MOTION FOR LEAVE TO FILE 7-PAGE REPLY UNDER SEAL

Now comes the defendant Ross McLellan, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for leave to file his 7-page reply to the Government's opposition to his Motion for Rule 15 Depositions of Krystyna Beck and Simone Paul under seal. As grounds and reasons therefore, Mr. McLellan states that an additional two pages are necessary to fully address the factual and legal issues raised by the Government's opposition and that due to the uncertain scope of the applicable protective orders concerning documents and testimony received in discovery the motion should be filed under seal.

WHEREFORE, the defendant respectfully requests that the instant motion be allowed.

Local Rule 7.1(a)(2) Certification

The undersigned counsel conferred with counsel for the Government and the Government, by and through William Johnson, does not oppose this request.

Respectfully submitted,

Ross McLellan
By his Attorney,

/s/ Martin G. Weinberg
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Dated: March 7, 2018

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, March 7, 2018, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

/s/ Martin G. Weinberg
Martin G. Weinberg